

REMARKS

Reconsideration is respectfully solicited.

Claim 3 has been amended to include the word "Daltons", which is expressed at page 10, third full paragraph, of the specification. Claim 11 is based on claims 4 and 5. Claims 12-14 are based on Claims 6-8. Claims 15 - 18 recite about 31700 molecular weight which is supported by page 8 second full paragraph of the specification.

The objection to claim 10 is traversed. Claim 10 has been canceled.

Accordingly, the objection to claim 10 is now moot.

The rejections of claims under 35 USC 112 are respectfully traversed. The original claims were amended with a view to the Examiner's recommendations. In addition, the gerunds of the steps in Claim 3 have been set forth in lower case.

Applicants respectfully traverse the rejection of Claims over Balaraman in view of Mizutani and Hanson et al. In applicants' view, when the subject matter of the claims is considered as a whole, as required by the express language of Section 103 of the Patent Statute, the claims are patentable.

Applicants' claims are to a process which the USPTO finds is novel. Specifically, the USPTO finds that Balaraman does not describe the product thrombinase having a molecular weight in range of 31000-32000; and that Balaraman does not describe the culture medium; and Balaraman does not disclose re-precipitation using ice-cold acetone. Thus the reference does not describe the product or the process of the claims. The PTO alleges "[I]t is also well within the purview of an ordinary artisan", and one of "skill would have been motivated..." without providing evidence to support the allegation.

Please see page 6 penultimate paragraph of the outstanding Office Action. In applicants' view, the following facts suggest that the USPTO has found piecemeal descriptions in references, used hindsight with a view to applicants' claimed recitations and ignored the actual subject matter of the applied art which underscores the vacuum in the grounds of rejection, rather than "motivation".

Mizutani is directed to complexes of polysaccharides or derivatives thereof with reduced glutathione. This is quite different from applicants' claims, and from the primary reference; and Mizutani does not describe the applicants' process.

Hanson is directed to enzymatic hydrolysis for the conversion of C-7 sugar to C-7 hydroxyl taxanes—which are diterpene compounds and may be anticancer agent(s) [see 5700669, Col. 1 lines 15-32]. This is quite different from applicants' claims, and from the primary reference, and from the process of the rejected claims.

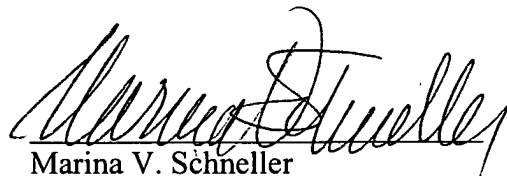
It is clear that Mizutani and Hanson do not recommend the production of thrombinase. Neither describes the process of the rejected claims or the process of Balaraman.

Rather the USPTO selects one process parameter from each to make up for the deficiencies of the primary reference. In applicants' view, the "artisan" referred by the USPTO would not look to Mizutani process parameters for forming complexes of polysaccharides or derivatives thereof with reduced glutathione to modify Balamar, or the Hanson reference. Mizutani is quite different from applicants' claims, and from the primary reference.

In applicants' view, the artisan [referred by the USPTO] would not look to Hanson' enzymatic hydrolysis for the conversion of C-7 sugar to C-7 hydroxyl taxanes—which are diterpene compounds and may be anticancer agent(s) to modify the Balamar reference or the Mitzutani reference to arrive at applicants' invention .

An early allowance is respectfully solicited

Respectfully submitted,



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